

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG APPLICATION  
ANTITRUST LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All End-Payor Actions

Master File No.  
19-md-02878-NMG

**END-PAYOR LEAD CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES AND  
PAYMENT OF LITIGATION EXPENSES, AND APPLICATION FOR  
SERVICE AWARDS**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, Lead Class Counsel for the End-Payor Plaintiffs respectfully submits this Motion seeking an award of attorneys’ fees and litigation expenses from the common fund. Lead Class Counsel also submit an application for Service Awards for the two Class Representatives, United Food and Commercial Workers Health and Welfare Fund of Northeastern Pennsylvania (“UFCW NEPA”) and Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana and HMO Louisiana, Inc. (“BCBS LA”) (collectively, the “Plaintiffs” or “Class Representatives”) as compensation for the service they provided as the Class Representatives.

The grounds for this Motion are set forth in the accompanying Memorandum of Law in Support of End-Payor Lead Class Counsel’s Motion for Attorneys’ Fees and Payment of Litigation Expenses, and Application for Service Awards, and the Joint Declaration of Gerald Lawrence, Esq. and James R. Dugan, II, Esq. in support of (A) End-Payor Class Plaintiffs’ Unopposed Motion for Final Approval of the Proposed Class Action Settlement; and (B) Lead Class Counsel’s Motion for an Award of Attorneys’ Fees, Litigation Expenses, and Service Awards, dated June 27, 2022, and all Exhibits attached thereto.

Dated: June 27, 2022

Respectfully submitted,

**LOWEY DANNENBERG, P.C.**

By: /s/Renee A. Nolan  
Gerald Lawrence  
Renee A. Nolan  
William Olson  
One Tower Bridge  
100 Front Street, Suite 520  
West Conshohocken, PA 19428  
Tel. (215) 399-4770  
glawrence@lowey.com  
rnolan@lowey.com  
wolson@lowey.com

Peter D. St. Phillip  
44 South Broadway  
Suite 1100  
White Plains, New York 10601  
Tel. 914-997-0500  
pstphillip@lowey.com

*Counsel for Plaintiff United Food and  
Commercial Workers Health and Welfare  
Fund of Northeastern Pennsylvania and the  
End-Payor Classes*

**THE DUGAN LAW FIRM, APLC**

James R. Dugan, II  
David S. Scalia  
TerriAnne Benedetto  
One Canal Place – Suite 1000  
365 Canal Street  
New Orleans, LA 70130  
Tel: 504-648-0180  
Fax: 866-328-7670  
jdugan@dugan-lawfirm.com  
dscalia@dugan-lawfirm.com  
tbenedetto@dugan-lawfirm.com

*Counsel for Louisiana Health Service &  
Indemnity Company d/b/a Blue Cross and  
Blue Shield of Louisiana, and HMO La., Inc.  
and the End-Payor Classes*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2022, a true copy of the foregoing document was served on all counsel of record by electronic transmission and/or electronically filing the document with the Court's CM/ECF system.

/s/Renee A. Nolan